Case 1-11-01520-ess Doc 25 Filed 06/11/12 Entered 06/11/12 16:41:09
Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 1 of 32 PageID #: 329

THE LAW OFFICES OF AVRUM J. ROSEN, PLLC ATTORNEYS AT LAW 38 NEW STREET HUNTINGTON, NEW YORK 11743

Telephone (631) 423-8527 Facsimile (631) 423-4536 e-mail address ajrlaw@aol.com

AVRUM J. ROSEN FRED S. KANTROW ALLAN B. MENDELSOHN * MICHAEL J. O'SULLIVAN * (* of counsel)

KIMBERLY I. BERSON DEBORAH L. DOBBIN GEORGE N. BARA KATHERINE A. GERACI

June 11, 2012

Hon. Elizabeth S. Stong United States Bankruptcy Judge United States Bankruptcy Court 271 Cadman Plaza East Brooklyn, New York 11201

Re: In re Khan, Chapter 7, Case No. 10-46901-ess

Kramer v. Mahia, Adv. Pro. No. 11-1520-ess

Dear Judge Stong:

I write this letter as a reply, and an opposition to the request for an adjournment from Mr. Dahiya. The request must be denied for a multitude of reasons. While, normally, this office would not hesitate to grant an adjournment to an attorney who was not capable of proceeding, either by physical or mental disability, the undersigned does not believe that this is the case in the present request.

Simply put, nothing in Mr. Dahiya's letter rings true. Annexed as Exhibit A is Mr. Dahiya's letter to Ms. Kramer, and this office's reply. Mr. Dahiya did not disclose any personal illness in that request. The undersigned specifically pointed out that at the last hearing on this matter, Mr. Dahiya had made mention of the four pending appeals that he had and the fact that these were going to require a lot of work. Your Honor repeatedly advised him to get counsel, and that this was the most important matter that he should deal with.

Instead, Mr. Dahiya waited until more than a week <u>after</u> the pre-trial statement in this matter was due to first request an adjournment. This Court is well aware of Mr. Dahiya's dilatory tactics, and specifically entered an Order requiring when everything had to be filed. This office complied.

More disturbing is the fact Mr. Dahiya does not appear to have any pending appeals that require his attention. The undersigned has run searches of the docket under his name in the Eastern District Bankruptcy Court, the Southern District Bankruptcy Court, the Southern District of New York and the Eastern District of New York. In addition, there are no deadlines approaching for any matters that are on before the District Court. Indeed, in the two matters in which briefs were due, Mr. Dahiya has already passed the dates where those briefs were to be filed. All of the cases in which Mr. Dahiya has filed in the Eastern District of New York are annexed hereto as Exhibit B. The Court will see that in the case of Mary Koutsagelos v. DeRosa 12-CV 01703, that an Order was entered on April 5, 2012 directing the filing and documenting of the brief within 14 days. A motion was made to extend the time, which was granted giving Mr. Dahiya another 45 days. That time period has now passed and no brief has been filed. A copy of that docket sheet is annexed hereto as Exhibit C. His letter request is also annexed as Exhibit C. In the case of Santangelo v. Pryor 12-CV-02310, an appeal was filed and an Order was entered directing the filing of a brief without fourteen days of May 18, 2012. Mr. Dahiya made a motion to reassign that case to another District Court Judge, but never moved for a stay of the time to perfect the appeal, or for an extension of that time. Accordingly, that time has now passed. A copy of that docket sheet is annexed hereto as Exhibit D. A review of all of the other cases filed in the Bankruptcy Court for the Eastern District by Mr. Dahiya, shows that there are no cases with open appeals. A copy of that list is annexed hereto as Exhibit E.

Indeed, it is extremely troubling that despite Mr. Dahiya's protestations of being swamped, and not having the time to do the work, and being in dire psychological distress, that he nonetheless undertook to file a new case on May 14, 2012. Several days <u>after</u> he new that he had all of the work and pre-trial statement to do in this case. A copy of that docket page is annexed as Exhibit F. In addition, on April 30, 2012, Mr. Dahiya filed another chapter 7 matter, a copy of which is also annexed hereto as Exhibit G. A search of the Southern District appeals, shows that Mr. Dahiya is involved in only one Southern District matter, and that there is nothing pending in that matter and all motions have been submitted.

Lastly, in the age of the internet, one must be careful what tales one tells. Mr. Dahiya's facebook page is unrestricted. A review of his page will show that other than being obsessed with working out, and several personal events that he has gone to in the last week or two, there is no sign of any mental distress or any slowdown in social activity. Lastly, Mr. Dahiya has appeared in court on several matters recently, and appeared at the CLE in the middle of May, where he proceeded to attempt to ask questions on this case from the panel of judges.

One of the more disturbing aspects of this letter, despite all of the inaccuracies, is the fact that he continues to not understand what this case is about. The last line of the third paragraph in the letter states "The issues raised in this matter are of very vital importance to both the consumer bar and debtors at large." This statement was made, despite the fact that your Honor explicitly told Mr. Dahiya that this trial was not about the U.S. Trustee program, was not about what trustees do in other cases, and was only about what he had done in this case, shows that he continues to engage in his own crusades despite what this Court has ordered.

Given these inaccuracies, it is respectfully submitted that this Court should not even begin to consider an adjournment of his hearing, unless and until, Mr. Dahiya were to submit an affidavit

Case 1-11-01520-ess Doc 25 Filed 06/11/12 Entered 06/11/12 16:41:09 Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 3 of 32 PageID #: 331

from a licensed medial doctor saying that he is unable to proceed with this matter. If that is the case, then Mr. Dahiya should also make provisions with the Bar Association to have other counsel take over his caseload while he gets any required help that he may need. He should certainly not be filing new cases, or continuing to represent people if he is in as fragile a mental state as he claims to be.

Thank you.

Very truly yours,

S/Avrum J. Rosen

AJR:ls Encl.

Avrum J. Rosen

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09
Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 4 of 32 PageID #: 332

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09 Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 5 of 32 PageID #: 333

Subj:

FW: request for adjournment of 13th june hearing on 1927

Date:

6/11/2012 3:30:54 P.M. Eastern Daylight Time

From:

dkramer@kramerpllc.com

To:

AJRLAW@aol.com

From: aol [mailto:ajrlaw@aol.com]
Sent: Friday, June 08, 2012 11:41 AM

To: Karamvir Dahiya

Cc: Debra Kramer; ny73@ecfcbis.com; Karamvir Dahiya

Subject: Re: request for adjournment of 13th june hearing on 1927

I fear you do not, and never will. That is unfortunate for you.

Sent from my Verizon Wireless 4G LTE DROID

----Original message-----

From: Karamvir Dahiya <karam@bankruptcypundit.com>

To: aol <ajrlaw@aol.com>

Cc: ny73@ecfcbis.com, Karamvir Dahiya <karam@legalpundit.com>, Debra Kramer

<dkramer@kramerplic.com>

Sent: Fri, Jun 8, 2012 11:25:35 EDT

Subject: Re: request for adjournment of 13th june hearing on 1927

If you recall, your client Ms. Kramer twice took additional time to answer...I immediately granted her. However upon that grant, she brought 1927 motion...talk about courtesy and reciprocity! I understand you now, Mr. Rosen.

On 6/8/2012 10:40 AM, aol wrote:

At the hearing you raised the other appeals. The judge told tyou three times that

This took precedence and to hire counsel. I note that you have waited until a week after your pre trial statement was due to make this request/ thus making this firm do all of the work by the deadline.

I am sorry for any personal loss, but under the totality of the circumstances your request is denied.

Thank you.

Avrum Rosemary
Sent from my Verizon Wireless 4G LTE DROID

----Original message-----

From: Karamvir Dahiya karam@bankruptcypundit.com

To: Debra Kramer <a href="mailto:karam@legalpundit.com

Sent: Fri, Jun 8, 2012 09:50:41 EDT

Subject: request for adjournment of 13th june hearing on 1927

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09

Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 6 of 32 PageID #: 334 2

Dear Counselors:

I am writing to request if you would consider adjournment, by 45 days, of June 13th hearing on Motion under 1927. I am not ready for it as I was not able to prepare owing to a serious personal loss and in midst of meeting deadline for four appeals pending with the District Courts. Please let me know if you are wiling to accommodate this request.

Sincerely, Karamvir Dahiya. Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09
Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 7 of 32 PageID #: 335

Select A Case

Karamvir Dahiya is an attorney in 7 cases.

1:03-mj-00788-JMA-2	Parmod Kumar	filed 05/16/03
1:04-mj-01095-CLP-1	Ahmed Sheikh Siddiqui	filed 08/12/04
1:11-mc-00524-SLT	Geltzer et al v. Dahiya et al	filed 07/13/11
1:12-cv-01703-NGG	Koutsagelos et al v. DeRosa	filed 04/05/12
1:12-cv-02365-DLI	Koutsagelos et al v. DeRosa	filed 05/14/12
2:11-mc-00561-JFB	Pryor v. Santangelo	filed 07/27/11
2:12-cv-02310-SJF	Santangelo v. Pryor	filed 05/10/12

PACER Service Center					
		Transaction	ı Receipt		
		06/11/2012	10:41:18		
PACER Login:	ar0090	Client Code:	khan		
Description:	Search	Search Criteria:	Last Name: dahiya First Name: karamvir Type: aty		
Billable Pages:	1	Cost:	0.10		

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09
Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 9 of 32 PageID #: 337

MJSELECT-CLP

U.S. District Court Eastern District of New York (Brooklyn) CIVIL DOCKET FOR CASE #: 1:12-cv-01703-NGG

Koutsagelos et al v. DeRosa

Assigned to: Judge Nicholas G. Garaufis Case in other court: BK, 1-11-50059 Cause: 28:1334 Bankruptcy Appeal

Date Filed: 04/05/2012 Jury Demand: None

Nature of Suit: 422 Bankruptcy Appeal

Jurisdiction: Federal Question

Appellant

Mary Koutsagelos

represented by Karamvir Dahiya

Dahiya Law Offices LLP 350 Broadway, Suite 412 New York, NY 10013

212-766-8000 Fax: 212-766-8001

Email: karam@legalpundit.com

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

V.

Appellee

Marianne DeRosa

Trustee

represented by Marianne DeRosa

Standing Chapter 13 Trustee 115 Eileen Way Ste. 105

Syosset, NY 11791

PRO SE

Krista M. Preuss

Marianne DeRosa, Standing Chapter 13

Trustee

Chapter 13 Trustee 115 Eileen Way

Suite 105

Syosset, NY 11791 (516)622-1340 Fax: (516)622-1347

Email: kristap@ch13mdr.com

ATTORNEY TO BE NOTICED

V.

Debtor

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09

Eastern District of New York Li Live Database Version 1-16 15/24/13 Page 11 of 32 Page 10 #: 339

Mary Koutsagelos

represented by Karamvir Dahiya

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
04/05/2012	1	Notice of APPEAL FROM BANKRUPTCY COURT. Bankruptcy Court case number 1-11-50059. File received, filed by Mary Koutsagelos. (Attachments: # 1 #24 Order on Motion) (Bowens, Priscilla) (Entered: 04/09/2012)
04/05/2012	2	NOTICE of Docketing of BANKRUPTCY APPEAL. Appellant's brief shall be served and filed with 14 days after the entry of the appeal on the docket; Appellee's brief shall be served and filed within 14 days after served of the brief of the appellant; Appellant's reply shall be served and filed within 14 days after the service of the brief of the appellee. (Bowens, Priscilla) (Entered: 04/09/2012)
04/23/2012		MOTION for Extension of Time to File <i>Appellant's Brief</i> by Mary Koutsagelos. (Lee, Tiffeny) (Entered: 04/23/2012)
04/23/2012	3	ORDER granting Motion for Extension of Time to File Appellant's Brief. Ordered by Judge Nicholas G. Garaufis on 4/19/2012. (c/m to Trustee) (Lee, Tiffeny) (Entered: 04/23/2012)
05/01/2012	4	MOTION to Amend/Correct/Supplement to be removed as a party to this bankruptcy appeal by Marianne DeRosa. (Preuss, Krista) (Entered: 05/01/2012)
05/02/2012	<u>5</u>	NOTICE of Change of Address by Krista M. Preuss, docket updated. (Lee, Tiffeny) (Entered: 05/07/2012)

	PACER S	Service Cente	er	
	Transa	ction Receipt		
	06/11/2	2012 10:43:01		
PACER Login: ar0090 Client Code: khan				
Description:	Docket Report	Search Criteria:	1:12-cv-01703-NGG	
Billable Pages:	2	Cost:	0.20	

Filed 06/11/12 Case 1-11-01520-ess Doc 25-1 Entered 06/11/12 16:41:09 y-03079-DLI Document 1-16 Filed 05/24/13 Page 12 of 32 PageID #: 340

Dahiya Law Offices LLC 350 Broadway Suite 412 New York New York 10013 Tel: 212 766 8000

Fax: 212 766 8001

APR 2 3 2012

BROOKLYN OFFICE

April 19, 2012

To

The Honorable Nicholas G. Garaufis Unites States District Judge Eastern District of New York United States Courthouse Room 1416 S 225 Cadman Plaza East Brooklyn, NY 11201

Fax: 718-613-2546

Re: Mary Koutsagelos et al v. DeRosa 12-cv-01703-NGG

Respected Judge:

I am the counsel for the aforesaid appellant, Ms. Mary Koutsagelos, appealing the underlying bankruptcy court decision. I am writing to request extension of time to file the brief.

Appellant's brief as per the schedule is to be served and filed within 14 days after the entry of the appeal on the docket. Your Honor, I am a solo practioner and involved with a few time consuming trials and brief writing.

Wherefore, I request Your Honor to kindly allow me an additional 45 days time to prepare the brief in Ms. Koutsagelos case. This is the first request in this case. Thank you for your consideration.

Yours since ely:

Karamvir S. Dahiya, Esq. .

Marianne DeRosa Standing Chapter 13 Trustee 115 Eileen Way Ste. 105 Syosset, NY 1179

APPLICATION GRANTED. So Ordered.

s/Nicholas G. Garaufis

NICHOLAS G. GARAUFIS United States District Judge Dated:

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09
Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 13 of 32 PageID #: 341

U.S. District Court Eastern District of New York (Central Islip) CIVIL DOCKET FOR CASE #: 2:12-cv-02310-SJF

Santangelo v. Prvor

Assigned to: Judge Sandra J. Feuerstein

Case in other court: US Bankruptcy Court, 8-11-09096-AST Nature of Suit: 422 Bankruptcy Appeal

Cause: 28:1334 Bankruptcy Appeal

Date Filed: 05/10/2012 Jury Demand: None

(801)

Jurisdiction: Federal Question

Appellant

Michael Santangelo

represented by Karamvir Dahiya

Dahiya Law Offices LLP 350 Broadway, Suite 412 New York, NY 10013

212-766-8000 Fax: 212-766-8001

Email: karam@legalpundit.com

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

V.

Appellee

Robert Pryor

Chapter 7 trustee of the bankruptcy estate of Jennifer Pupo Santangelo

represented by Robert L. Pryor

Pryor & Mandelup, LLP 675 Old Country Road Westbury, NY 11590 516-997-0999

Fax: 516-333-7333

Email: rlp@pryormandelup.com

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
05/10/2012	1	Notice of APPEAL FROM BANKRUPTCY COURT. Bankruptcy Court case number 8-11-09096-AST. File received, filed by Michael Santangelo. (Attachments: # 1 USBC 11-ap-9096 Doc 1 Complaint, # 2 USBC 11-ap-9096 Doc 5 Motion to Withdraw Reference, # 3 USBC 11-ap-9096 Doc 7 Motion for Default Judgment, # 4 USBC 11-ap-9096 Doc 9 Answer to Complaint, # 5 USBC 11-ap-9096 Doc 10 Affirmation in Opposition to Motion for Default, # 6 USBC 11-ap-9096 Doc 11 Replay to Affirmation in Opposition to Motion for Default, # 7 USBC 11-ap-9096 Doc 12 Order on Motion for Default, # 8 USBC 11-ap-9096 Doc 13 Answer to Counterclaim, # 9 USBC 11-ap-9096 Doc 20 Motion to Dismiss, # 10 USBC 11-ap-9096 Doc 21 Memorandum of Law in Support of Motion to Dismiss, # 11 USBC 11-ap-9096 Doc 24 Affirmation in

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09

Eastern District of New York I Live Database Version ied 05/24/13 Page 15 of 32 Page Dage 343 2

		Opposition, # 12 USBC 11-ap-9096 Doc 26 Reply to Motion to Dismiss, # 13 USBC 11-ap-9096 Doc 27 Amended Reply to Motion to Dismiss, # 14 USBC 11-ap-9096 Doc 28 Motion to Authorize-Direct, # 15 USBC 11-ap-9096 Doc 31 Affirmation in Opposition to Motion, # 16 USBC 11-ap-9096 Doc 33 Decision and Order Dismissing Counterclaim and Denying Motion to Strike Jury Demand, # 17 USBC 11-ap-9096 Doc 38 Civil Cover Sheet, # 18 USBC 11-ap-9096 Doc 39 Appellant Designation and Statement of Issues) (Russo, Eric) (Entered: 05/18/2012)
05/18/2012	2	NOTICE of Docketing of BANKRUPTCY APPEAL. Appellant's brief shall be served and filed with 14 days after the entry of the appeal on the docket; Appellee's brief shall be served and filed within 14 days after served of the brief of the appellant; Appellant's reply shall be served and filed within 14 days after the service of the brief of the appellee. (Russo, Eric) (Entered: 05/18/2012)
05/22/2012	3	MOTION to Reassign Case by Michael Santangelo. (Attachments: # 1 Exhibit) (Dahiya, Karamvir) (Entered: 05/22/2012)

	PACER S	Service Cente	r
	Transa	ction Receipt	
	06/11/2	2012 10:46:39	
PACER Login:	ar0090	Client Code:	khan
Description:	Docket Report	Search Criteria:	2:12-cv-02310-SJF
Billable Pages:	2	Cost:	0.20

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09

Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 16 of 32 PageID #: 344

Dahiya Law Offices LLC

350 Broadway Suite 412 New York NY 10013 Tel: 212 766 8000 Fax: 212 766 8001

May 22, 2012

Hon. Sandra Feuerstein United States District Court Eastern District of New York Long Island Courthouse 100 Federal Plaza Central Islip, NY 11722

re: Santangelo v. Pryor
12-cv-02310-SJF
Related Matter: Withdrawal of Reference: 11-mc-00561
In the matter of Robert Pryor v. Michael Santangelo
(Adversary No. 11-09096 in Bankruptcy Case No. 10-78726).

Dear Judge:

I represent Michael Santangelo, in the aforesaid Appeal re: Santangelo v. Pryor, 12-cv-02310-SJF. I am writing to request that this appeal be assigned to Hon. Judge Joseph F. Bianco. Judge Bianco is already seized with the underlying merits of the issues and facts raised in the instant appeal in a related Motion to Withdraw matter dealing with the same issues and pertaining to same parties.

I had filed a Motion for Withdrawal of Reference in the adversary case, Robert Pryor v. Michael Santangelo, case no. 11-09096. The motion for withdrawal of reference has been fully briefed, the Judge has yet to rule on the said motion. The issues raised in the motion to withdraw, regarding intrinsic limits imposed by Article III, constitutionality of providing non-Article III judges with judicial powers, bankruptcy referee/judges power to rule on State law issues etc., are going to be same in the instant appeal. I had also mentioned in the Civil Cover Sheet (copy attached), that there is a pending related matter regarding this issue and same parties. Wherefore, it is respectfully requested that this appeal be assigned to Hon. Judge Joseph Bianco.

Sincerely:,	/s/ karamvir dahiya
	Karamvir Dahiya, Esq.

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09
Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 17 of 32 PageID #: 345

Notice to:

Robert Pryor, Trustee 675 Old Country Road Westbury, NY 11590 Phone: (516) 997-0999 Fax: (516) 333-7333

Chambers of Hon. Joseph Bianco United States District Court Eastern District of New York Long Island Courthouse 100 Federal Plaza Central Islip, NY 11722

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09 Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 18 of 32 PageID #: 346

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

CIVIL COVER SHEET

This form is REQUIRED for the use of the Clerk of Court for the purpose of initiating the civil docket sheet.

IN RE: Bankruptcy Case No. 10-78726-AST Adv	. Pro. No. (if applicable) 11-09096
Bankrup	tcy Appeal
APPELLANTS MICHAEL SANTANGELO	APPELLEES ROBERT PRYOR TRUSTEE OF ESTATE OF JENNIFER PUPO SANTANGELO
ATTORNEYS (FIRM NAME, ADDRESS, TEL. NO.) KARAMVIR DAHIYA, Esq. DAHIYA LAW OFFICES, LLC 350 BROADWAY SUITE 412 NEW YORK NEW YORK 10013 TEL: 212 766 8000	ATTORNEYS (IF KNOWN) ROBERT L. PRYOR, Esq. Pryor & Mandel LLP 675 Old Country Road Westbury NY 11590 Tel: 516 997-0999
BASIS OF JURISDICTION: Federal Question	
CAUSE OF ACTION - 28:1334 Bankruptcy Appeal (Write brief state Bankruptcy Referee/Judge Hon. Alan S. Trust exercised judicial processes Constitution in the underlying adversary matter by ruling on the matter when the defendant had not submitted to the jurisdiction court presided over by Article I Judges or Special Referees.	owers of the United States in violation of Article III and United State based Cause of Action as well as continuing presiding over
NATURE OF SUIT: 422 Bankruptcy Appeal (801)	
RELATED CASE(S) IN <u>DISTRICT COURT</u> , IF ANY DISTRICT JUDGE Hon. Joseph F. Bianco	DOCKET NUMBER 11-MC-00561
CIVIL CASES ARE DEEMED RELATED IF PENDING CASE INVOLVED: 1. PROPERTY INCLUDED IN AN EARLIER NUMBERED PENDING SUIT 2. SAME ISSUE OF FACT OR GROWS OUT OF THE SAME TRANSACTION 3. VALIDITY OR INFRINGEMENT OF THE SAME PATENT COPYRIGHT OR	TRADEMARK
Date: Feb 24, 2012 Signature of Attorney of [or Appellant Pro Se]	of Record:
FOR COURT USE ONLY	
APPLYING IFPJUDGE	MAG. JUDGE

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09
Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 19 of 32 PageID #: 347

CIVIL COVER SHEET, Bankruptcy Appeal (cont'd)

Did the cause of action arise in Nassau or S	Suffolk County? No
If YES, please indicate which county:	<u>.</u>
I am currently admitted in the Eastern Distr	rict of New York and currently a member in good standing of the bar of this court.
YES 🗸	ио 🔲
Are you currently the subject of any discipl	inary action(s) in this or any other state or federal court?
YES (If yes, please explain)	по 🗌
	dress below. Your bar code consists of the initials of your first and last name and the last four yother four-digit number registered by the attorney with the Clerk of Court. This information 1(b) of the local civil rules.
Attorney Bar Code: kd9738	
E-Mail Address: karam@legalpundit.com	

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09 Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 20 of 32 PageID #: 348

Select a Case

There were 2 matching persons.

There were 74 matching cases.

Name	Case No.	Case Title	Chapter / Lead BK case	Date Filed	Party Role	Date Closed
Dahiya, Karamvir (aty) (73 cases)	00-40352-smb	Francisco M. Plasencia	7	02/10/00	N/A	06/27/00
	<u>02-15791-pcb</u>	Gabriel Guerrero	7	11/19/02	N/A	04/29/03
	<u>02-41091-reg</u>	A&B Fuel Inc.	11	04/15/02	N/A	10/07/02
	02-43293-alg	Baburao V. Pandit	7	11/07/02	N/A	08/11/03
	<u>02-43294-pcb</u>	Valerie Weiss	7	11/07/02	N/A	04/01/03
	02-43295-rdd	Naureen Amber Khan	7	11/07/02	N/A	02/19/03
	<u>02-43297-pcb</u>	Nesrin Feradov	7	11/07/02	N/A	02/19/03
	03-11010-alg	Swati Singh	7	02/21/03	N/A	07/01/03
	<u>03-11055-ajg</u>	Peter A. Ford	7	02/25/03	N/A	08/19/03
	03-12583-ajg	Laura Galloway	7	04/25/03	N/A	10/28/03
	<u>03-14728-rdd</u>	Nazar Abbas	7	07/24/03	N/A	01/03/07
	<u>03-17348-reg</u>	Esam Ul Qayyum	7	11/19/03	N/A	05/27/10
	<u>03-18165-smb</u>	Abdul Qayyum	7	12/26/03	N/A	05/04/07
	03-18166-pcb	Suzanne Mary Heriza	7	12/26/03	N/A	09/08/04
	04-03024-scc	Pereira v. Chitroda	Lead BK: 02- 12192-scc Allied Deals, Inc.	04/29/04	N/A	11/18/11
	<u>04-10433-rdd</u>	Tomas Marin	7	01/23/04	N/A	07/26/04
	<u>04-10678-rdd</u>	Monique C. Pillard	11	02/04/04	N/A	08/17/11
	04-10845-rdd	Elite Model Management	11	02/11/04	N/A	05/05/09

	Corporation				
<u>04-11249-smb</u>	Lauren Grasch	7	02/27/04	N/A	06/15/04
04-12769-alg	Steve M. Morrison	7	04/22/04	N/A	08/09/04
<u>04-17793-brl</u>	Siraj A. Rizvi	7	12/10/04	N/A	02/21/06
04-17794-alg	Muhammad Younis Malik	7	12/10/04	N/A	06/07/05
04-17795-alg	Mohammad G. Kibria	7	12/10/04	N/A	04/10/08
<u>05-13589-jmp</u>	Abdul Mannan	13	05/13/05	N/A	08/31/06
<u>05-15043-brl</u>	Waheed M. Raja	7	07/07/05	N/A	05/04/06
05-15044-pcb	Armando Montesdeoca	7	07/07/05	N/A	05/04/06
<u>05-17406-brl</u>	Eugene O. Doku	7	09/02/05	N/A	08/02/06
<u>05-48019-ajg</u>	Robert Rowe and Erminie Rowe	7	10/15/05	N/A	06/26/06
05-48022-ajg	Mohammad K Arshad and Syeda Mahmuda Arshad	7	10/15/05	N/A	04/13/06
<u>05-48025-smb</u>	Nahida Khanam	7	10/15/05	N/A	05/04/06
05-48027-alg	Kamran S Arshad	7	10/15/05	N/A	05/22/06
05-48060-alg	Mohammad A Khan	7	10/15/05	N/A	05/24/06
<u>05-48141-ajg</u>	Shoaib Qureshi	7	10/15/05	N/A	04/19/06
<u>06-10176-smb</u>	KSPJA Inc.	11	01/31/06	N/A	05/29/08
<u>06-10177-smb</u>	KPFA Inc.	11	01/31/06	N/A	04/12/07
06-11457-reg	Lynette Koplitz	7	06/28/06	N/A	02/15/07
06-12165-rdd	Jennie Shen and Wen Hua Xu	7	09/15/06	N/A	06/21/07
07-01673-alg	Bank of America, NA v. Sanchez	Lead BK: 06- 13136-alg Hilda Sanchez	04/02/07	N/A	02/27/08
<u>07-11494-reg</u>	Wen Hua Xu	7	05/16/07	N/A	04/30/08
<u>07-11495-brl</u>	Rekha Mathkar	7	05/16/07	N/A	04/09/08
<u>07-12028-smb</u>	Harish Sharma	7	06/29/07	N/A	01/14/08

<u>07-12029-reg</u>	Juan Pablo Escobar	7	06/29/07	N/A	02/19/08
<u>07-12666-smb</u>	Bathiya C Dharmadasa	7	08/20/07	N/A	02/21/08
<u>07-13934-mg</u>	Sandra M Egipciaco	13	12/13/07	N/A	05/06/10
<u>08-10453-brl</u>	1219 First Avenue Pharmacy Inc.	11	02/08/08	N/A	05/28/08
<u>08-12168-shl</u>	Nasher Chowdry	13	06/10/08	N/A	N/A
08-13097-alg	Mohammad Ali and Angibelis Ali	7	08/06/08	N/A	12/01/08
<u>08-14207-reg</u>	Poh Wah Lock	7	10/27/08	N/A	02/19/10
<u>09-10637-reg</u>	Kawaljeet Singh	7	02/13/09	N/A	09/22/09
09-11410-alg	Dharma Lal Risal	7	03/26/09	N/A	07/16/09
<u>09-11411-reg</u>	Syed Aziz Ahmed	7	03/26/09	N/A	09/11/09
09-11412-pcb	Jatin Anand and Ritika Anand	7	03/26/09	N/A	12/07/09
09-13715-ajg	Steve Hollister and Victoria B. Hollister	7	06/10/09	N/A	10/18/11
<u>09-15445-ajg</u>	YL West 87th Holdings I. LLC	11	09/09/09	N/A	12/07/11
<u>09-16139-ajg</u>	Muhammad Ali	7	10/14/09	N/A	02/07/11
09-16786-ajg	YL West 87th Street, LLC	11	11/13/09	N/A	09/13/11
<u>09-16950-mg</u>	Rehan Ashfaq	7	11/23/09	N/A	05/28/10
<u>09-23645-rdd</u>	Gurmeet S. Khunda and Prabhjit K. Khunda	7	04/02/09	N/A	06/15/10
<u>10-12467-reg</u>	Thaline Tarpinian	7	05/06/10	N/A	10/31/11
<u>10-13221-scc</u>	Abbas Badar	7	06/17/10	N/A	09/27/10
<u>10-14578-reg</u>	Koly Ahmed	7	08/26/10	N/A	05/31/11
<u>10-14781-mg</u>	Caroline Alissa Bush	7	09/09/10	N/A	N/A
10-22206-rdd	Haniffa H Bham and Harish T Bham	7	02/03/10	N/A	02/08/10
10-24549-rdd	The Great Atlantic & Pacific Tea	11	12/12/10	N/A	N/A

		Company, Inc.				
	<u>10-30000-cgm</u>	Haniffa H Bham and Harish T Bham	7	02/03/10	N/A	05/05/10
	<u>11-10987-shl</u>	Satya N Charka	7	03/07/11	N/A	05/22/12
	11-11363-alg	Nathaniel Ajunwa and Regina Ajunwa	7	03/28/11	N/A	N/A
	11-12045-jmp	Veena Singh	7	04/29/11	N/A	01/10/12
	<u>11-23181-rdd</u>	Natalie A Pinto	7	06/13/11	N/A	11/28/11
	12-10114-shl	Charles J. Johnson	13	01/11/12	N/A	N/A
	12-10800-alg	GEL LLC	11	02/28/12	N/A	N/A
	12-10801-alg	GRL LLC	11	02/28/12	N/A	N/A
	12-12067-reg	Hemant Bhargava	7	05/14/12	N/A	N/A
Dahiya, Karamvir (aty) (1 case)	09-23645-rdd	Gurmeet S. Khunda and Prabhjit K. Khunda	7	04/02/09	N/A	06/15/10

PACER Service Center					
	Transaction Receipt				
06/11/2012 10:51:27					
PACER Login:	ar0090	Client Code:	khan		
Description:	Search	Search Criteria:	LName: dahiya FName: karamvir Type: aty		
Billable Pages:	2	Cost:	0.20		

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09 Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 25 of 32 PageID #: 353

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09

New York Southern Live System Document 1-16 Filed 05/24/13 Page 26 of 32 Page 10 #: 354 3

DebtEd

U.S. Bankruptcy Court Southern District of New York (Manhattan) Bankruptcy Petition #: 12-12067-reg

Date filed: 05/14/2012

Assigned to: Judge Robert E. Gerber

Chapter 7 Voluntary No asset

Debtor

Hemant Bhargava

208 Tamarack Court Morganville, NJ 07751 MONMOUTH-NJ

SSN / ITIN: xxx-xx-9473

represented by Karamvir Dahiya

Dahiya Law Offices LLC

350 Broadway Suite 412

New York, NY 10013

212-766-8000

Fax: 212-766-8001

Email: karam@legalpundit.com

Trustee Alan Nisselson

Windels Marx Lane & Mittendorf, LLP 156 West 56th Street New York, NY 10019 (212) 237-1199

U.S. Trustee United States Trustee 33 Whitehall Street 21st Floor New York, NY 10004

(212) 510-0500

Filing Date	#	Docket Text
05/14/2012	<u>1</u>	Voluntary Petition (Chapter 7). Order for Relief Entered. Filed by Karamvir Dahiya of Dahiya Law Offices LLC on behalf of Hemant Bhargava. (Dahiya, Karamvir) (Entered: 05/14/2012)
05/14/2012	<u>2</u>	Chapter 7 Statement of Current Monthly Income and Means Test Calculation - Form 22A filed by Karamvir Dahiya on behalf of Hemant Bhargava. (Dahiya, Karamvir) (Entered: 05/14/2012)
		Exhibit D Re: Credit Counseling Requirement, Stating Credit

05/14/2012	<u>3</u>	Counseling Certificate to be filed within 14 days filed by Karamvir Dahiya on behalf of Hemant Bhargava. Credit Counseling Certificate due: 5/29/2012. (Dahiya, Karamvir) (Entered: 05/14/2012)	
05/14/2012	<u>4</u>	Certificate of Credit Counseling, Certificate Number: 00134-nj-cc-017796274 filed by Karamvir Dahiya on behalf of Hemant Bhargava. (Dahiya, Karamvir) (Entered: 05/14/2012)	
05/15/2012		Trustee Alan Nisselson added to the case. (Bickerstaff, Chris). (Entered: 05/15/2012)	
05/15/2012	<u>5</u>	Request for 341(a) Notice with 341(a) meeting to be held on 6/21/2012 at 10:30 AM at 80 Broad St., 4th Floor, USTM. Financial Management Course Due: 8/20/2012. Last day to oppose the discharge of the debtor or to challenge dischargeability of certain debts is 8/20/2012. (Bickerstaff, Chris). (Entered: 05/15/2012)	
05/17/2012		Receipt of Voluntary Petition (Chapter 7)(12-12067) [misc,969] (306.00) Filing Fee. Receipt number 8566877. Fee amount 306.00. (U.S. Treasury) (Entered: 05/17/2012)	
05/17/2012	<u>6</u>	Notice of 341(a) Meeting of Creditors with Certificate of Mailing. (related document(s) (Related Doc # 5)). Notice Date 05/17/2012. (Admin.) (Entered: 05/18/2012)	
05/21/2012	<u>8</u>	Notice of Returned Mail (Cappiello, Karen). (Entered: 05/23/2012)	
05/23/2012	<u>7</u>	Notice of Appearance & Request for Service of Papers filed by Pranali Datta on behalf of US Bank National Association, as Trustee for Structured Adjustable Rate Mortgage Loan Trust, Mortgage Pass-Through Certificates, Series 2006-8. (Datta, Pranali) (Entered: 05/23/2012)	

	PACER Service Center				
	Transaction Receipt				
06/11/2012 10:54:54					
PACER ar0090 Client Code: khan			khan		
			12-12067-reg Fil or Ent: filed		

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09

New Clark State have been Document 1-16 Filed 05/24/13 Page 28 of 32 Page 18 48:356 3

Description:	Docket Report	Search	From: 5/25/2011 To: 6/11/2012 Doc From: 0 Doc To: 99999999 Headers: included Format: html
Billable Pages:	1	Cost:	0.10

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09
Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 29 of 32 PageID #: 357

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09
Live Database: nyeb live
Case 1:13-cv-03079-DLI Document 1-16 Filed 05/24/13 Page 30 of 32 PageID #: 358

DebtEd, MEANSNO, RELATED

U.S. Bankruptcy Court Eastern District of New York (Brooklyn) Bankruptcy Petition #: 1-12-43137-cec

Date filed: 04/30/2012

Assigned to: Carla E. Craig

Chapter 7 Voluntary No asset

Debtor

Leelananda N. Morawakkoralge 888 Van Duzer Street Fl. 2nd Staten Island, NY 10304 RICHMOND-NY

SSN / ITIN: xxx-xx-0451

represented by Karamvir Dahiya

Dahiya Law Offices, LLC 350 Broadway Suite 412 New York, NY 10013 (212)766-8000

Fax: (212)766-8001

Email: <u>karam@bankruptcypundit.com</u>

Trustee

Gregory Messer
Law Offices of Gregory Messer, PLLC
26 Court Street
Suite 2400
Brooklyn, NY 11242
(718) 858-1474

U.S. Trustee
United States Trustee
271 Cadman Plaza East
Suite 4529
Brooklyn, NY 11201
(718) 422-4960

Filing Date	#	Docket Text
04/30/2012	<u>1</u>	Chapter 7 Voluntary Petition. Fee Amount \$306 Filed by Karamvir Dahiya on behalf of Leelananda N. Morawakkoralge (Dahiya, Karamvir) (Entered: 04/30/2012)
04/30/2012	<u>2</u>	Pre-Petition Statement Pursuant to LR 2017-1 Filed by Karamvir Dahiya on behalf of Leelananda N. Morawakkoralge (Dahiya, Karamvir) (Entered: 04/30/2012)
		Meeting of Creditors Chapter 7 No Asset & Appointment of Chapter 7 Trustee, Gregory Messer, , 341(a) Meeting to be held

04/30/2012		on 06/05/2012 at 03:30 PM at Room 2579, 271 Cadman Plaza East, Brooklyn, NY . Last day to oppose discharge or dischargeability is 08/06/2012 . Financial Management Certificate due by 08/06/2012 . (Entered: 04/30/2012)
04/30/2012	<u>3</u>	Deficient Filing Chapter 7: Certificate of Credit Counseling due by 4/30/2012. Section 521 Incomplete Filings due by 6/14/2012. Copies of pay statements received from any employer due by 5/14/2012. Incomplete Filings due by 5/14/2012. (cjm) (Entered: 05/01/2012)
05/01/2012		Related case 11-46996-cec discharged 02/08/12 (cjm) (Entered: 05/01/2012)
05/01/2012		Judge Elizabeth S. Stong removed from the case due to Related Case, Judge Reassigned. Judge Carla Craig added to the case. (cjm) (Entered: 05/01/2012)
05/02/2012	<u>4</u>	Notice of Failure to Pay Internet Filing Fee (BK) (cjm) (Entered: 05/02/2012)
05/03/2012	<u>5</u>	BNC Certificate of Mailing with Notice of Deficient Filing Notice Date 05/03/2012. (Admin.) (Entered: 05/04/2012)
05/04/2012	<u>6</u>	BNC Certificate of Mailing with Notice of Failure to Pay Internet Filing Fee (BK) Notice Date 05/04/2012. (Admin.) (Entered: 05/05/2012)
05/09/2012		Receipt of Voluntary Petition (Chapter 7)(1-12-43137) [misc,volp7a] (306.00) Filing Fee. Receipt number 9991148. Fee amount 306.00. (U.S. Treasury) (Entered: 05/09/2012)
05/09/2012	<u>7</u>	Certificate of Credit Counseling for Debtor Filed by Karamvir Dahiya on behalf of Leelananda N. Morawakkoralge (RE: related document(s)3 Deficient Filing Chapter 7) (Dahiya, Karamvir) (Entered: 05/09/2012)
05/09/2012	<u>8</u>	Request for Notice - Meeting of Creditors Chapter 7 No Asset (ddm) (Entered: 05/09/2012)
05/11/2012	9	BNC Certificate of Mailing - Meeting of Creditors Notice Date 05/11/2012. (Admin.) (Entered: 05/12/2012)
05/11/2012	<u>10</u>	BNC Certificate of Mailing with Notice of Electronic Filing Notice Date 05/11/2012. (Admin.) (Entered: 05/12/2012)
		Final Notice of Section 521 Deficiencies (ddm) (Entered:

Case 1-11-01520-ess Doc 25-1 Filed 06/11/12 Entered 06/11/12 16:41:09 Live Database: nyell-live Database: nyell-li

05/31/2012	<u>11</u>	05/31/2012)	
06/02/2012	<u>12</u>	BNC Certificate of Mailing with Final Notice of Section 521 Deficiencies Notice Date 06/02/2012. (Admin.) (Entered: 06/03/2012)	

	PACER Service Center				
	Transaction Receipt				
	06/11/2012 11:01:28				
PACER Login:	ar0090	ar0090 Client Code: khan			
Description:	Docket Report	Search Criteria:	1-12-43137-cec Fil or Ent: filed Doc From: 0 Doc To: 99999999 Term: included Headers: included Format: html		
Billable Pages:	2	Cost:	0.20		